

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP., )  
Plaintiff, )  
v. ) Misc. No. 17-151-LPS  
BOLIVARIAN REPUBLIC OF )  
VENEZUELA, )  
Defendant. )

**SPECIAL MASTER'S PROPOSED FORM OF ORDER REGARDING  
SCHEDULE FOR THE REMAINDER OF THE MARKETING PROCESS**

OF COUNSEL:

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Dated: April 24, 2025  
12190155 / 21202.00001

The Special Master,<sup>1</sup> pursuant to the *Order* dated April 21, 2025 (D.I. 1741), having met and conferred with the Sale Process Parties, hereby submits a proposed form of order setting forth a schedule and associated directions for the remainder of the Marketing Process, attached hereto as

**Exhibit A.** See D.I. 1741 ¶ 3.

Respectfully submitted,  
POTTER ANDERSON & CORROON LLP

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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).